

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al., No. 15-cv-9903

**NOTICE OF RULE 60(a) MOTION FOR
CORRECTIONS TO PARTIAL FINAL JUDGMENT**

Plaintiffs by undersigned counsel move under Federal Rule of Civil Procedure 60(a) for an order correcting this Court’s March 6, 2020 Order of Partial Final Default Judgments on Behalf of Burnett/Iran Plaintiffs Identified at Exhibits A and B (Burnett/Iran XX) (ECF No. 6039) (the “Order”), and for the below reasons state as follows:

- 1) Plaintiffs have discovered errors and omissions in the Order related to the descriptions and damages awarded to the plaintiffs identified in Exhibits A and B.
- 2) These errors consist of: the relationship between the plaintiff identified in Exhibit A and the 9/11 decedent identified in Exhibit A was stated incorrectly in the Order; the Order incorrectly identified the three plaintiffs identified on Exhibit B and which expert reports supported the award of economic damages to these three plaintiffs; the Order did not to indicate that the three plaintiffs identified in Exhibit B should be awarded compensatory damages for decedents’ pain and suffering as set forth in Exhibit B; the Order did not indicate that the plaintiffs identified in Exhibit B should be awarded prejudgment interest; the Order did not indicate that the Plaintiffs identified in Exhibit B may submit an

application for punitive and other damages at a later date consistent with any future rulings made by the Court.

- 3) These errors are a result of clerical mistakes and arise from an oversight or omission on the part of Plaintiffs' counsel.
- 4) These errors have the potential to create issues for Plaintiffs enforcing and collecting judgments.

WHEREFORE, Plaintiffs respectfully request the issuance of the Corrected Order of Partial Final Default Judgments on Behalf of Burnett/Iran Plaintiffs as set forth in Exhibit 1 to this motion.

Dated: January __, 2022

Respectfully submitted,

/s/ John Eubanks
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